



With the Court's permission, Gavin is filing herewith her responses to Hayes' first set of interrogatories as **Exhibit A** hereto. Hayes' Interrogatory Nos. 9, 10, 11, 13, 16, and 22, and Gavin's answers, illustrate the point that Hayes was seeking information from the beginning of discovery about Gavin's discrimination allegations. In these interrogatories he seeks all relevant information and does not say it is limited to "retaliation," as he does in Interrogatory Nos. 12 and 15. Nor does he provide a date limitation that would indicate he only sought information for the period after she filed her complaints against him within the Boston Police Department. Gavin's answers, therefore, were not limited to information about retaliation; they appropriately included information prior to March 2017 which only pertains to the discrimination claim against Hayes. Gavin respectfully contends that Hayes similarly sought discovery about the discrimination and retaliation allegations against him throughout discovery.

Accordingly, the Court should not limit Count III and should allow Gavin to proceed with her direct discrimination claim against Hayes.

Respectfully submitted,

**DONNA GAVIN**

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Date: July 20, 2021

**CERTIFICATE OF SERVICE**

I, Nicholas B. Carter, Esq., hereby certify that the foregoing document was filed through the ECF system and will therefore be sent electronically to all counsel of record as identified on the Notice of Electronic Filing (NEF).

/s/ Nicholas B. Carter